

REMARKS

The last office action does not address the problem with the previous rejection that the alleged sheets 1 and 16 that are flattened are both the platen or support for other operations. They are not a sheet or a thing that is being operated on, but is basically the foundation of the tool that is being used. Therefore, they cannot be reasonably said to be temporarily flattened by applying a flattening force to the center of the sheet. No one would design a structure in which the holder or support has to be flattened every time it is used. Moreover, no row or column electrodes are ever attached to the item 1 or 16. Certainly, the films 5 and 6 are not secured to the platen 1 or 16.

For example, Nakamura's paragraph 71 calls the item 1 a plate-like developer holder 1. The so-called film 5 or 6 that is allegedly applied to the sheet is the developer 5, as explained in paragraph 72. The developer 5 spreads on the developer holder by centrifugal force. There is no applying of any column electrodes to the sheet while the sheet is held in a flat configuration. There is no flattening of the sheet and there is no reason to flatten the sheet, because there is no sheet. The developer holder 1 does not need to be flat or could not be flattened. There is no securing of any sheet that is a second sheet to the items 1 or 16. Just because items are in contact through developer 5 does not mean they are secured together.

The suggestion that Nakamura, which teaches applying developer, could be combined with something that teaches row and column electrodes is untenable. There is no reason to combine a thing that puts developer down using a platen, with row and column electrodes. The reference to Nakamura teaches no reason to flatten its support or platen and teaches no securement or flattening of any sheet. There is no applying of anything to the sheet while the sheet is held in a flattened configuration because, necessarily, it was flat to begin with and there is no securing any sheet to a second sheet that is solid. The item 10 is a wafer and it is never secured to any developer or to the platen itself. All that is done is the wafer is exposed to the developer to develop the wafer. Thus, there is no reason to flatten the bottom support of the tool or to apply row or column electrodes to the bottom support of the tool or to secure anything to the bottom support of the tool while continuing to hold the center of the tool in the supposedly flattened configuration. The rejection simply does not work.

The suggestion that there is a rationale to combine Nakamura and Wu "in order to effectively control emission," is similarly untenable. There is no reason to worry about emission

in the tool of Nakamura because he is not making anything that would have any kind of emission. He is developing wafers and the assertion that he would have some interest in flattening the tool itself makes no sense. In effect, the argument argues that the wafer is used to flatten the tool upon which the wafer is applied.

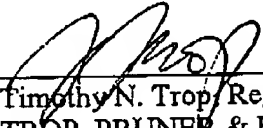
The suggestion that one would put electrodes on the platen of Nakamura is surprising. There is absolutely no reason why anything in Nakamura would be used in Wu. There is no reason that Nakamura, in his wildest dreams, would care about "effectively controlling emission." The assertion that Wu teaches something about films that are row and column electrodes for effect control of device emission is unsupported. There is no reason that simply applying row and column electrodes to a substrate would make them better or control emission. Every electrode is put on some type of substrate and, therefore, electrodes on substrates have no better emission than any other electrodes on substrates. The fact that electrodes are known is, of course, the case. The problem is Nakamura would have no reason to put electrodes on the bottom surface of his tool.

The reference to Wu suggests no rationale to flatten sheets and, therefore, teaches no reason to use any tool of Nakamura. There is no reason to believe that Wu would use any type of press or platen type structure, such as that described in Nakamura, to make his electroluminescent panel display. It is not seen where or how, such a clamping apparatus would find use in Wu. Wu is apparently made in the semiconductor fabrication facility by deposition processes. There is no reason to use any kind of structure of the type shown in Nakamura in connection with the application of electrodes.

Therefore, reconsideration would be appropriate.

Respectfully submitted,

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Timothy N. Trop/Reg. No. 28,994
TROP, PRUNER & HU, P.C.
1616 South Voss Road, Suite 750
Houston, TX 77057-2631
713/468-8880 [Phone]
713/468-8883 [Fax]
Attorneys for Intel Corporation